

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Jen Banford and
Annette Wiles,

Case No.: 15-cv-03740
(PJS/LIB)

Plaintiffs,

v.

**DECLARATION
OF
SHANNON MILLER**

The Board of Regents of the
University of Minnesota,

Defendants.

I, Shannon Miller, submit the following Declaration:

1. I am the former head coach of women's ice hockey at University of Minnesota Duluth, and former plaintiff in this action.

2. I am openly gay and was so during my entire time as a head coach at UMD.

3. In 2014, I had two assistant coaches, [REDACTED] and [REDACTED]
[REDACTED]

4. [REDACTED] was openly gay. She took her partner on work-related trips and functions, referred to her as her partner, and after getting married, referred to her as her "wife."

5. [REDACTED] was openly gay from well before I hired her to be my assistant coach. She talked and lived openly, and it was common knowledge.

6. In 2014, [REDACTED] was the team's part-time Strength & Conditioning Coach. [REDACTED] was openly gay. She talked and lived openly, and it was common knowledge. In the fall of 2014 [REDACTED] was not in a relationship. During the course of that season, she began to get very ill with a life-threatening illness.

7. In addition to Jen Banford and myself, there were two more women who worked with the Women's ice hockey program. One was [REDACTED], the other [REDACTED]. Neither was openly gay.

8. I am familiar with the practice of letting a head coach's assistant coaches go at the same time a head coach is let go. That is often, but not always, considered a common practice in Division I athletics.

9. UMD has men's and women's Division I hockey programs, but is a Division II school. The only Division I sport at UMD is Ice Hockey.

10. This practice is customarily limited to the elimination of the assistant coaches.

11. All of the Division I teams at the University of Minnesota have a full-time Director of Operations. The University of Minnesota is a Big Ten school, with all Division I teams. The full time Director of Operations position at such a school has a very different budget and larger day-to-day operations. Head coaches at a Division I school such as the University of

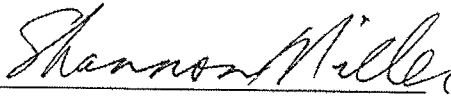
Minnesota hire their own Director of Operations, directly supervise them, and provide their performance review.

12. Though a Division II school, UMD's Division I Men's Ice Hockey team had a full time Director of Operations. Scott Sandelin, head coach for the men's team, hired the team's full time Director of Operations.

13. Though I fought hard for years to get a full time Director of Operations, I was not successful. Jen Banford was assigned to the team part-time. I did not hire her, she did not report to me, and I never did her annual evaluation.

I declare under penalty of perjury under the laws of the United States and the State of California that everything I have stated in this document is true and correct.

Executed on November 16, 2020, in Palm Springs, California.


Shannon Miller